

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
YOSSEF KAHLON

Plaintiff,

No. 24-CV-02439 (BMC)

-against-

COUNTY OF NASSAU, JOHN/JANE DOE
MEMBERS OF THE NASSAU COUNTY
DISTRICT ATTORNEY'S OFFICE, CELINE
BOULBEN and JOHN /JANE DOE
"METOO" ORGANIZATION(S),

**STIPULATION
TO UNSEAL RECORDS**

Defendants.

-----X
CELINE BOULBEN,

Counterclaim-Plaintiff,

-against-

YOSSEF KAHLON,

Counterclaim-Defendant.

-----X
WHEREAS, plaintiff YOSSEF KAHLON ("Plaintiff") commenced the within action by the filing of a Complaint ("the Action") against, *inter alia*, THE COUNTY OF NASSAU and JOHN/JANE DOE MEMBERS OF THE NASSAU COUNTY DISTRICT ATTORNEY'S OFFICE ("the County Defendants") based on his arrest in or about August 2021 claiming violations of his constitutional rights, for which the records of the Nassau County Police Department have been sealed; and

WHEREAS, Plaintiff was subsequently prosecuted by the Nassau County District Attorney's Office, for which the records have been sealed; and

WHEREAS, following a jury trial held in the Supreme Court of the State of New York in and for the County of Nassau, the result of which plaintiff was acquitted of all charges against him, for which the records have been sealed; and

WHEREAS, the undersigned are the attorneys representing Plaintiff and the County Defendants,

NOW, therefore:

IT IS STIPULATED AND AGREED, that all records in the custody of the

- (1) The Nassau County Police Department,
- (2) The Nassau County District Attorney's Office,
- (3) The Supreme Court of the State of New York in and for the County of Nassau,
- (4) The Nassau County Sheriff's Department

concerning the arrest, criminal prosecution and incarceration of Plaintiff, which are the basis of the within Action, shall be made accessible to the undersigned attorneys for the purpose of the investigation and defense of the within Action, and any subsequent court action, and the information obtained will remain confidential between Plaintiff and the County Defendants, except for those records included in court proceedings and documents filed in connection with the Complaint.

ATTORNEY FOR PLAINTIFF:

Bruce Barket, Esq.
Alexander Klein, Esq.
Barket Epstein Kearon Aldea
& Lo Turco, LLP
666 Old Country Road, Suite 700
Garden City, New York 11530

Dated: July 21, 2024

By:  _____

ATTORNEY FOR COUNTY DEFENDANTS:

Thomas A. Adams, Nassau County Attorney
Ralph J. Reissman, Deputy County Attorney
JARED A. KASSCHAU
Nassau County Attorney
1 West Street
Mineola, New York 11501

Dated: May 30, 2024

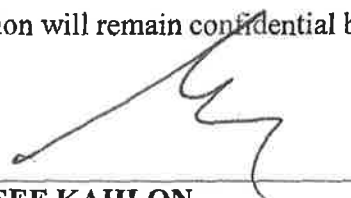
By:  _____
DCA RALPH J. REISSMAN

AUTHORIZATION TO UNSEAL RECORDS

STATE OF NEW YORK)
) ss.:
COUNTY OF NASSAU)

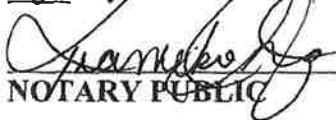
YOSSEF KAHLON, being duly sworn, deposes and says:

I am the plaintiff in the court action entitled *Yossef Kahlon v. County of Nassau, et al.*, Docket No. 24-CV-02439 (BMC) in the United States District Court for Eastern District of New York (hereinafter, the “Action”). I hereby grant the Nassau County Attorney’s Office the right to unseal and secure copies of all records which may be deemed confidential pursuant to Criminal Procedure Law Section 720.35, in the custody of the Nassau County Police Department, the Nassau County District Attorney’s Office, the Supreme Court of the State of New York in and for the County of Nassau, and the Nassau County Sheriff’s Department, concerning the criminal charges, prosecution, trial and imprisonment which is the basis of the Action, excluding any Grand Jury minutes which may exist, all of which records may be deemed confidential pursuant to Criminal Procedure Law Section 720.35. These records may be unsealed solely for the purpose of the instant matter and any ensuing litigation, and the information will remain confidential between all parties and their respective counsel.


YOSSEF KAHLON

Sworn to before me this

12 day of June 2024


NOTARY PUBLIC

KAMEKO CRAIG
NOTARY PUBLIC - STATE OF NEW YORK
NO. 01CR8411895
QUALIFIED IN NASSAU COUNTY
COMMISSION EXPIRES 12/07/2024